

# PRIVACY POLICY

Policy number	5.4	Version	2019 1
Drafted by	Warren Mendola	Approved by Board on	18 <sup>th</sup> June 2019
Responsible person	Catherine Collopy	Scheduled review date	June 2022

## INTRODUCTION

The Board of Central Ringwood Community Centre is committed to protecting the privacy of personal information which the organisation collects, holds and administers. Personal information is information which directly or indirectly identifies a person.

## PURPOSE

The purpose of this document is to provide a framework for the Central Ringwood Community Centre in dealing with privacy considerations.

## POLICY

Central Ringwood Community Centre collects and administers a range of personal information for the purposes of the Centre. The organisation is committed to protecting the privacy of personal information it collects, holds and administers.

Central Ringwood Community Centre recognises the essential right of individuals to have their information administered in ways which they would reasonably expect – protected on one hand, and made accessible to them on the other. These privacy values are reflected in and supported by our core values and philosophies and also reflected in our Privacy Policy, which is compliant with the [Privacy Act 1988](#) (Commonwealth).

Central Ringwood Community Centre is bound by laws which impose specific obligations when it comes to handling information. The organisation has adopted the following principles contained as minimum standards in relation to handling personal information.

Central Ringwood Community Centre will

- Collect only information which the organisation requires for its primary function;
- Ensure that stakeholders are informed as to why we collect the information and how we administer the information gathered;
- Use and disclose personal information only for our primary functions or a directly related purpose, or for another purpose with the person's consent;
- Store personal information securely, protecting it from unauthorised access; and
- Provide stakeholders with access to their own information, and the right to seek its correction.

## ENDORSED

18<sup>TH</sup> JUNE 2019

CENTRAL RINGWOOD COMMUNITY CENTRE

# PRIVACY PROCEDURES

Procedures number	5.4	Version	2019 1
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## RESPONSIBILITIES

Central Ringwood Community Centre's Board is responsible for developing, adopting and reviewing this policy.

Central Ringwood Community Centre's Manager is responsible for the implementation of this policy, for monitoring changes in Privacy legislation, and for advising on the need to review or revise this policy as and when the need arises.

## PROCESSES

### Collection

Central Ringwood Community Centre will:

- Only collect information that is necessary for the performance and primary function of Central Ringwood Community Centre.
- Notify stakeholders about why we collect the information and how it is administered.
- Notify stakeholders that this information is accessible to them.
- Collect personal information from the person themselves wherever possible.
- If collecting personal information from a third party, be able to advise the person whom the information concerns, from whom their personal information has been collected.
- Collect Sensitive information only with the person's consent. (Sensitive information includes health information and information about religious beliefs, race, gender and others).
- Determine, where unsolicited information is received, whether the personal information could have collected it in the usual way, and then if it could have, it will be treated normally. (If it could not have been, it must be destroyed, and the person whose personal information has been destroyed will be notified about the receipt and destruction of their personal information).

### Use and Disclosure

Central Ringwood Community Centre will:

- Only use or disclose information for the primary purpose for which it was collected or a directly related secondary purpose.
- For other uses, Central Ringwood Community Centre will obtain consent from the affected person.

- In relation to a secondary purpose, use or disclose the personal information only where:
  - a secondary purpose is related to the primary purpose and the individual would reasonably have expected us to use it for purposes; or
  - the person has consented; or
  - Certain other legal reasons exist, or disclosure is required to prevent serious and imminent threat to life, health or safety.
- In relation to personal information which has been collected from a person, use the personal information for direct marketing, where that person would reasonably expect it to be used for this purpose, and Central Ringwood Community Centre has provided an opt out and the opt out has not been taken up.
- In relation to personal information which has been collected other than from the person themselves, only use the personal information for direct marketing if the person whose personal information has been collected has consented (and they have not taken up the opt-out).
- State in Central Ringwood Community Centre privacy policy whether the information is sent overseas and further will ensure that any overseas providers of services are as compliant with privacy as Central Ringwood Community Centre is required to be.
- Provide all individuals' access to personal information except where it is a threat to life or health or it is authorized by law to refuse and, if a person is able to establish that the personal information is not accurate, then Central Ringwood Community Centre must take steps to correct it. Central Ringwood Community Centre may allow a person to attach a statement to their information if Central Ringwood Community Centre disagrees it is inaccurate.
- Where for a legal or other reason we are not required to provide a person with access to the information, consider whether a mutually agreed intermediary would allow sufficient access to meet the needs of both parties.
- Make no charge for making a request for personal information, correcting the information or associating a statement regarding accuracy with the personal information.

### **Storage of personal information at Central Ringwood Community Centre**

- Implement and maintain steps to ensure that personal information is protected from misuse and loss, unauthorized access, interference, unauthorized modification or disclosure.
- Before Central Ringwood Community Centre discloses any personal information to an overseas recipient including a provider of IT services such as servers or cloud services, establish that they are privacy compliant. Central Ringwood Community Centre will have systems which provide sufficient security.
- Ensure that the Central Ringwood Community Centre data is up to date, accurate and complete.

### **Destruction and de-identification of the Central Ringwood Community Centre's private information.**

- Destroy personal information once is not required to be kept for the purpose for which it was collected, including from decommissioned laptops and mobile phones.
- Change information to a pseudonym or treat it anonymously if required by the person whose information Central Ringwood Community Centre holds and will not use any government related identifiers unless they are reasonably necessary for our functions.

### **Data Quality**

Central Ringwood Community Centre will:

- Take reasonable steps to ensure that the information Central Ringwood Community Centre collects is accurate, complete, up to date, and relevant to the functions we perform.

### **Data Security and Retention**

Central Ringwood Community Centre will:

- Only destroy records in accordance with the organisation's Records Management Policy.

### **Openness**

Central Ringwood Community Centre will:

- Ensure stakeholders are aware of Central Ringwood Community Centre's Privacy Policy and its purposes.
- Make this information freely available in relevant publications and on the organisation's website.

### **Access and Correction**

Central Ringwood Community Centre will:

- Ensure individuals have a right to seek access to information held about them and to correct it if it is inaccurate, incomplete, misleading or not up to date.

### **Anonymity**

- Allow people from whom the personal information is being collected to not identify themselves or use a pseudonym unless it is impracticable to deal with them on this basis.

### **Making information available to other organisations**

Central Ringwood Community Centre can:

- Release information to third parties where it is requested by the person concerned.

### **RELATED DOCUMENTS**

- Records Management Policy
- [Confidentiality Policy](#)
- [Employment References Policy](#)

### **AUTHORISATION**

Catherine Collopy  
20<sup>th</sup> June 2019

## PRIVACY POLICY – FOR EXTERNAL USE/PRIVACY ACT COMPLIANCE

### PRIVACY POLICY

#### **Your privacy is important**

This statement outlines the Central Ringwood Community Centre's policy on how the Central Ringwood Community Centre uses and manages personal information provided to or collected by it.

The Central Ringwood Community Centre is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act and is compliant with the Privacy Amendment **(Enhancing Privacy Protection) Act 2012**.

The Central Ringwood Community Centre may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to the Central Ringwood Community Centre's operations and practices and to make sure it remains appropriate to the changing legal environment.

#### **What kind of personal information does the Central Ringwood Community Centre collect and how does the Central Ringwood Community Centre collect it?**

The type of information the Central Ringwood Community Centre collects and holds includes (but is not limited to) personal information, including sensitive information, about:

- Names, addresses, date of birth, phone contacts, email contacts, cultural status, emergency contact person and any disabilities. Education and employment status, residency information.
- Police checks and Working with Children checks, bank details, tax and superannuation details of employed staff & insurance records for renters of the Central Ringwood Community Centre.

#### **Personal Information you provide:**

The Central Ringwood Community Centre will generally collect personal information held about an individual by way of phone calls, forms, meetings etc. You do have the right to seek to deal with us anonymously or using a pseudonym, but in almost every circumstance it will not be practicable for us to deal with you or provide any services to you except for the most general responses to general enquiries, unless you identify yourself.

#### **Personal Information provided by other people:**

In some circumstances the Central Ringwood Community Centre may be provided with personal information about an individual from a third party, for example an employment service provider or a disability service provider.

### **In relation to employee records:**

Under the Privacy Act the Australian Privacy Principles do not apply to an employee record. As a result, this Privacy Policy does not apply to the Central Ringwood Community Centre's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between the Central Ringwood Community Centre and employee. However, the Central Ringwood Community Centre must provide access and ensure compliance with the Health Privacy Principles under the **Victorian Health Records Act 2001**.

### **How will the Central Ringwood Community Centre use the personal information you provide?**

The Central Ringwood Community Centre will use personal information it collects from you for the primary purpose of collection, and for such other secondary purposes that are related to the primary purpose of collection and reasonably expected, or to which you have consented.

In relation to direct marketing, the Central Ringwood Community Centre will use your personal information for direct marketing where you have provided that information, and you are likely to expect direct marketing: only then you will be sent direct marketing containing an opt out. If we use your personal information obtained from elsewhere we will still send you direct marketing information where you have consented and which will also contain an opt out. We will always obtain your consent to use sensitive information as the basis for any of our direct marketing.

We may use video surveillance for security purposes and the footage will be used only by the Central Ringwood Community Centre and by the providers of our security services for security purposes. Surveillance videos are not used by the Central Ringwood Community Centre for other purposes and the footage is not publicly available. Surveillance cameras are not located in any bathrooms or change room facilities.

### **Job applicants, staff members and contractors:**

In relation to personal information of job applicants, staff members and contractors, the Central Ringwood Community Centre's primary purpose of collection is to assess and (if successful) to engage the applicant, staff member or contractor, as the case may be.

The purposes for which the Central Ringwood Community Centre uses personal information of job applicants, staff members and contractors include:

- For insurance purposes, and
- to satisfy the Central Ringwood Community Centre's legal obligations

Where the Central Ringwood Community Centre receives unsolicited job applications these will usually be dealt with in accordance with the unsolicited personal information requirements of the Privacy Act.

**Volunteers:**

The Central Ringwood Community Centre also obtains personal information about volunteers who assist the Central Ringwood Community Centre in its functions or conduct associated activities, such as to enable the Central Ringwood Community Centre and the volunteers to work together.

**Who might the Central Ringwood Community Centre disclose personal information to?**

The Central Ringwood Community Centre may disclose personal information, including sensitive information, held about an individual to:

- Government departments;
- People providing services to the Central Ringwood Community Centre, and
- Anyone you authorise the Central Ringwood Community Centre to disclose information to.

**Sending information overseas:**

The Central Ringwood Community Centre will not send personal information about an individual outside Australia without:

- obtaining the consent of the individual (in some cases this consent will be implied); or
- Otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

**We do use overseas providers of IT services including servers and cloud services.****How does the Central Ringwood Community Centre treat sensitive information?**

In referring to 'sensitive information', the Central Ringwood Community Centre means:

"information relating to a person's racial ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences or criminal record, that is also personal information; and health information about an individual".

Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless you agree otherwise, or the use or disclosure of the sensitive information is allowed by law.

**Management and security of personal information**

The Central Ringwood Community Centre's staff are required to respect the confidentiality of personal information and the privacy of individuals.

The Central Ringwood Community Centre has in place steps to protect the personal information the Central Ringwood Community Centre holds from misuse, loss, unauthorised



access, modification, interference or disclosure by use of various methods including locked storage of paper records and passworded access rights to computerised records.

When you use our website, having your cookies enabled will allow us to maintain the continuity of your browsing session and remember your details when you return. We may also use web beacons, Flash local stored objects and JavaScript. If you adjust your browser settings to block, reject or delete these functions, the webpage may not function in an optimal manner. We may also collect information about your IP address, although this may not identify you.

### **Updating personal information**

The Central Ringwood Community Centre endeavours to ensure that the personal information it holds is accurate, complete and up-to-date. A person may seek to update their personal information held by the Central Ringwood Community Centre by contacting the Privacy Officer of the Central Ringwood Community Centre at any time.

The Australian Privacy Principles and the Health Privacy Principles require the Central Ringwood Community Centre not to store personal information longer than necessary. In particular, the Health Privacy Principles impose certain obligations about the length of time health records must be stored.

You have the right to check what personal information the Central Ringwood Community Centre holds about you.

**Under the Commonwealth Privacy Act** and the **Health Records Act**, an individual has the right to obtain access to any personal information which the Central Ringwood Community Centre holds about them and to advise the Central Ringwood Community Centre of any perceived inaccuracy. There are some exceptions to this right set out in the applicable legislation. To make a request to access any information the Central Ringwood Community Centre holds about you, please contact the Privacy Officer in writing.

The Central Ringwood Community Centre may require you to verify your identity and specify what information you require. Although no fee will be charged for accessing your personal information or making a correction, the Central Ringwood Community Centre may charge a fee to retrieve and copy any material. Central Ringwood Community Centre If the information sought is extensive, the Central Ringwood Community Centre will advise the likely cost in advance.

### **How long will the Central Ringwood Community Centre keep my information?**

Under our destruction and de-identification policies, your personal information that is no longer required will be de-identified or destroyed. In many circumstances, however it will be kept for marketing purposes, as you will have consented to that in writing with us.

### **Enquiries and privacy complaints**

If you would like further information about the way the Central Ringwood Community Centre manages the personal information it holds, please contact the centre management. If you have any concerns, complaints or you think there has been a breach of privacy, then also please contact centre management who will first deal with you usually over the phone. If

we then have not dealt satisfactorily with your concerns we will meet with you to discuss further. If you are not satisfied with our response to your complaint within 30 days from this meeting then you can refer your complaint to the Office of the Australian Information Commissioner via:

- email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)
- tel: 1300 363 992
- fax: +61 2 9284 9666